

## Part B – Please use a separate sheet for each representation

Name or Organisation: **CPRE Staffordshire**

3. To which part of the Local Plan does this representation relate?

Paragraph	Part D Paras 6.42 to 6.46	Policy	EC1	Policies Map	Page 240
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/> No
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

### CPRE Representation Number 6

#### West Midlands Interchange (E33)

##### Designation

The West Midlands Interchange was considered to be a National Strategic Infrastructure Project (NSIP) on the basis that it included a rail interchange.

South Staffordshire Council opposed the proposals in the NSIP.

CPRE Staffordshire was closely involved, with others, in the proposals for the West Midlands interchange, including attending and giving evidence at the Examination in Public.

After the Examination and Inspector's Report a Development Regulation Consent was granted by the Secretary of State for Transport with conditions.

The decision on the application for a Development Consent Order (DCO) for the West Midlands Interchange was taken on 4 May 2020. (Details and links are shown in the background section below.)

We are concerned that if the site of the West Midlands Interchange was allocated and removed from Green Belt in the current plan there is a distinct likelihood that the Rail–Road Interchange, the key element put forward to justify its status as an NSIP for the massive development, would not be constructed - but the development would proceed regardless.

We are concerned that if the Green Belt designation is also removed and the whole site is allocated the promoters will repeatedly argue to be allowed to proceed with the next phases of the development (not permitted by the NSIP decision) without the Interchange.

#### Allocation

As consent is already in place we see no good reason to now allocate the site; instead it could be identified as having consent granted by the Secretary of State, subject to stringent conditions.

#### Green Belt

The removal of Green Belt Status would be more appropriately considered in future Plan Reviews; providing that the Interchange is completed and further phases are permitted following its construction.

#### Background

*Rail Freight Interchanges: West Midlands Interchange* by Four Ashes Limited  
Links:

<https://infrastructure.planninginspectorate.gov.uk/projects/west-midlands/west-midlands-interchange/>

*Planning Inspectorate Notification of Decision Letter*

*Secretary of State Decision Letter*

*Development Consent Order as made by the Secretary of State*

*Examining Authority's Recommendation Report*

*Post-Examination Submissions*

*Regulation 31 Notice*

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

## Modification

We ask that:

1. The Employment Allocation designation is deleted from the Plan and replaced by a site identification designation (or similar) which refers to the Secretary of State's decision and the key importance of early construction off the Rail-Road interchange; which was used to justify the NSIP and DCO.  
*(Possibly similar to EC10 of the Plan)*
2. The current Green Belt designation should not be removed in the current Plan.

(Continue on a separate sheet /expand box if necessary)

**Please note** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**

I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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We were in attendance and gave evidence before the Examining Authority, Paul Singleton BSc MA MRTPI, and we have particular concerns in relation to the plan approach now proposed by South Staffordshire Council.

If the matters raised (or related issues) are to be heard, we would wish to be there to answer questions and contribute to the discussion.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.